

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to: The cases identified
in Appendix A.

MASTER DOCKET

18-md-02865-LAK

**MOTION FOR ISSUANCE OF A REQUEST FOR INTERNATIONAL JUDICIAL
ASSISTANCE TO OBTAIN EVIDENCE IN DENMARK**

PLEASE TAKE NOTICE that the undersigned attorneys for the individual and entity defendants identified in Appendix A (collectively, “Defendants”), will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for the issuance of a Request for International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil and Commercial Matters and 28 U.S.C. § 1781(b)(2). In support of this motion, Defendants rely upon the accompanying Memorandum of Law and Declaration of Thomas E.L. Dewey, dated April 19, 2024 and the exhibits attached thereto.

Dated: New York, New York
April 19, 2024

Respectfully submitted,

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LLC Roth 401(K) Plan, Tarvos Pension Plan, Voojo Productions LLC Roth 401(K) Plan, Xiphias LLC Pension Plan

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APPENDIX A

Defendants	Counsel	Associated Case(s)
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Elizabeth van Merkensteijn		
Azalea Pension Plan		
Basalt Ventures LLC Roth 401(K) Plan		
Bernina Pension Plan		
Bernina Pension Plan Trust		
Michelle Investments Pension Plan		
Omineca Pension Plan		
Omineca Trust		

Remece Investments LLC Pension Plan		
Starfish Capital Management LLC Roth 401(K) Plan		
Tarvos Pension Plan		
Voojo Productions LLC Roth 401(K) Plan		
Xiphias LLC Pension Plan		
Richard Markowitz	Alan E. Schoenfeld Wilmer Cutler Pickering Hale and Dorr LLP 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: (212) 230-8800 alan.schoenfeld@wilmerhale.com	18-cv-04833 19-cv-01781 19-cv-01783 19-cv-01785 19-cv-01791 19-cv-01792 19-cv-01806 19-cv-01808 19-cv-01812 19-cv-01815 19-cv-01867 19-cv-01868 19-cv-01869 19-cv-01870 19-cv-01895 19-cv-01896 19-cv-01898 19-cv-01904 19-cv-01906 19-cv-01911 19-cv-01922 19-cv-01924 19-cv-01926 19-cv-01929
Jocelyn Markowitz		
Avanix Management LLC Roth 401(K) Plan		
Batavia Capital Pension Plan		

Calypso Investments Pension Plan		19-cv-10713
Cavus Systems LLC Roth 401(K) Plan		
Hadron Industries LLC Roth 401(K) Plan		
RJM Capital Pension Plan		
RJM Capital Pension Plan Trust		
Routt Capital Pension Plan		
Routt Capital Trust		
Robert Klugman	David L. Goldberg Michael M. Rosensaft Zhanna A. Ziering Katten Munchin Rosenman LLP 50 Rockefeller Plaza New York, NY 10020 Tel.: (212) 940-8800 Fax: (212) 940-8776 david.goldberg@katten.com	18-cv-04434 18-cv-07824 18-cv-07827 18-cv-07828 18-cv-07829 19-cv-01781 19-cv-01783 19-cv-01785 19-cv-01788 19-cv-01791 19-cv-01792 19-cv-01794 19-cv-01798 19-cv-01800 19-cv-01801 19-cv-01803 19-cv-01806 19-cv-01808 19-cv-01809 19-cv-01810 19-cv-01812 19-cv-01813 19-cv-01815 19-cv-01818 19-cv-01870 19-cv-01918 19-cv-01922 19-cv-01926
RAK Investment Trust		
Aerovane Logistics LLC Roth 401(K) Plan		
Edgepoint Capital LLC Roth 401(K) Plan		
Headsail Manufacturing LLC Roth 401(K) Plan		
The Random Holdings 401(K) Plan		
The Stor Capital Consulting LLC 401(K) Plan		

		19-cv-01928 19-cv-01929 19-cv-01931
Michael Ben-Jacob	<p>Thomas E. L. Dewey Dewey Pegno & Kramarsky LLP 777 Third Avenue – 29th Floor New York, New York 10017 Tel.: (212) 943-9000 Fax: (212) 943-4325 tdewey@dpklaw.com</p> <p>Elliot R. Peters Julia L. Allen Keker, Van Nest & Peters LLP 633 Battery Street San Francisco, CA 94111 Tel.: (415) 962-7188 epeters@keker.com</p>	18-cv-04434 18-cv-07824 18-cv-07827 18-cv-07828 18-cv-07829 19-cv-01781 19-cv-01783 19-cv-01785 19-cv-01788 19-cv-01791 19-cv-01792 19-cv-01794 19-cv-01798 19-cv-01800 19-cv-01801 19-cv-01803 19-cv-01806 19-cv-01808 19-cv-01809 19-cv-01810 19-cv-01812 19-cv-01813 19-cv-01815 19-cv-01818 19-cv-01866 19-cv-01867 19-cv-01868 19-cv-01869 19-cv-01870 19-cv-01871 19-cv-01873 19-cv-01894 19-cv-01896 19-cv-01918 19-cv-01922 19-cv-01926 19-cv-01928 19-cv-01929 19-cv-01931 21-cv-05339